

## **EXHIBIT 4**

**REDACTED VERSION  
OF DOCUMENT SOUGHT  
TO BE SEALED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

/

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

WAYMO LLC RULE 30(b)(6)  
VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ  
PALO ALTO, CALIFORNIA  
THURSDAY, AUGUST 3, 2017

REPORTED BY:

ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2663199

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/

Videotaped Deposition of Pierre-Yves Droz  
taken on behalf of the Defendant, on August 3,  
2017, at Morrison & Foerster LLP, 950 Page Mill  
Road, Palo Alto, California, beginning 9:27 a.m.,  
and commencing at 7:25 p.m., Pursuant to Notice,  
and before me, ANDREA M. IGNACIO, CSR, RPR, CRR,  
CLR ~ License No. 9830.

1 [REDACTED] [REDACTED]  
2 [REDACTED] [REDACTED]  
3 [REDACTED] [REDACTED]  
4 [REDACTED] [REDACTED]  
5 [REDACTED] [REDACTED]  
6 [REDACTED] [REDACTED]  
7 [REDACTED] [REDACTED]  
8 [REDACTED] [REDACTED]  
9 [REDACTED] [REDACTED]  
10 [REDACTED] [REDACTED]  
11 [REDACTED] [REDACTED]  
12 [REDACTED] 13:33  
13 MR. KIM: All right. 13:33  
14 Q So I -- I don't understand why you're saying 13:33  
15 from your personal knowledge. You know, we -- we 13:33  
16 looked earlier at your deposition topics. 13:33  
17 A Yep. Okay. 13:33  
18 Q And Exhibit 1273 specifically asks for the 13:33  
19 time cost and specific people involved in developing 13:33  
20 each of the alleged trade secrets. 13:33  
21 MR. JAFFE: Which topic are you reading from? 13:33  
22 MR. KIM: Deposition Topic No. 9. 13:33  
23 Q And so I'm asking you about the -- the cost 13:33  
24 to implement [REDACTED] -- 13:33  
25 A So, are you asking what -- 13:34

1 THE WITNESS: Sorry. Go ahead. 13:34

2 MR. JAFFE: One -- one second here. 13:34

3 THE WITNESS: Yes. 13:34

4 MR. JAFFE: So, Mr. Droz is here subject to 13:34

5 our objections. As I stated at the outset of this 13:34

6 deposition, he's designated on the development of the 13:34

7 | asserted trade secrets other than 25. So I just want 13:34

8 to make that clear for the record. 13:34

9 | Go ahead. 13:34

10 THE WITNESS: [REDACTED] [REDACTED]

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[illegible]

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13:35

25 MR. JAFFE: Objection; form; outside the 13:35

1 scope. 13:35

2 THE WITNESS: [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] 13:35

10 MR. KIM: Q. So, you're not prepared to talk 13:35

11 about the cost of development of Trade Secret No. 2 as 13:35

12 Waymo's corporate designated witness; is that correct? 13:35

13 A I'm not. 13:35

14 (Document marked Exhibit 1278 13:36

15 for identification.) 13:36

16 THE VIDEOGRAPHER: 1278. 13:36

17 THE WITNESS: Thank you. 13:36

18 MR. KIM: So I've marked for identification, 13:36

19 as Exhibit No. 1278, an e-mail from John McCauley at 13:36

20 Quinn Emanuel, dated Wednesday, August 2nd, 2017, at 13:36

21 7:56 p.m. 13:36

22 Q And, if you look at the second paragraph, it 13:36

23 says: 13:36

24 "Waymo designates Mr. Droz to testify with 13:36

25 regard to Topics 9 and 10 of Uber's second 30(b)(6) 13:37